

May 21, 2019

Dr. Calvin Ball
Howard County Executive
George Howard Building
3430 Court House Drive
Ellicott City, MD 21043

Dear County Executive Ball,

Thanks for the opportunity to attend stakeholder meetings and to provide comments on the county's Draft Complete Streets Policy (March 2017 version).

As you have seen in your Transition Committee report, post-election listening sessions and recent poll results, making our community more walkable, bikeable, and transit-friendly is a top concern of Howard County residents.

For people who live in many Howard County communities, a lack of pedestrian and bicycling facilities stifles opportunity, isolates neighbors from each other and unnecessarily ties us to our vehicles. This also prevents many of us from having safe access to employment, public transit, schools, grocery stores, social and cultural institutions, and other community services. Residents, businesses, civic groups and school communities want improved walking, biking and bus stop facilities. We want complete streets.

When it comes to active transportation, we share your vision for the future for Howard County. We foresee a future where more kids walk to school safely; where you can easily bike or walk to bus stops, shopping or work; where people in wheelchairs can freely access more places; and where walkers and bikers have dedicated spaces on the streets to stay safe.

The undersigned organizations also share your commitment to and desire for safer and more accessible places to walk and bike. Designing and building our roadways and paths so they can safely and routinely accommodate all users—including pedestrians, bicyclists, transit users and motorists regardless of age or ability—is imperative to making Howard County a better place to live, work and visit.

We commend you for your proposed historic capital budget investment in Bicycle Master Plan projects. If approved by the Council, the \$2.2 million+ in funding will be nearly four times the amount allocated in FY 2018. This is great progress, but much more needs to be done.

Through increased county funding, enactment of a strong complete streets law, and visionary implementation of that law, we will finally make progress in designing and building the roadways, paths, and transit stops that our residents need.

Howard County residents deserve a world-class complete streets vision and policy structure that will ensure Howard County roads and pathways are safe, accessible and connected for years to come.

The current draft policy fails to live up to that expectation due to several shortfalls. Below are several suggestions that if incorporated, would result in a world-class complete streets policy. The county should:

1. **Enact the complete streets policy as an ordinance, not a resolution:** According to many national experts, including the National Complete Streets Coalition, Smart Growth America, AARP, Voices for Healthy Kids, and the American Heart Association, passing a law is the best practice, world-class way of enacting a complete streets vision. Many communities across the country, including some here in Maryland, passed complete streets resolutions only to find that years passed without true progress and fidelity to the complete streets vision desired. Baltimore City and Anne Arundel County are just two local examples of communities that ended up passing a complete streets law subsequent to a resolution. A complete streets policy passed in resolution form does not have the force of law and will not result in a lasting legacy of safer, more accessible roadways for Howard County generations to come. A resolution represents a hope for change. A law guarantees it.
2. **Limit exceptions to complete street design and construction** – As per best practice guidelines, the only exceptions to the complete streets law should be for:
 - a. Ordinary maintenance (not including road resurfacing or repainting);
 - b. Streets where specific users are prohibited by law;
 - c. Circumstances when the cost of accommodation is disproportionate to the need or probable use such as constructing sidewalks on rural roads where pedestrian use is rare; and
 - d. Emergency repairs.
3. **Require the timely completion of a new Design Manual (Volume III Roads and Bridges)** – The complete streets law should call on county departments to complete work on a new design manual that will give county contractors the details they need to build complete streets. Given that two years have already been spent developing such a manual and that several quality complete streets manuals already exist, it shouldn't take much time for the county to finish work on it and send it to the Council for public review and modification. The law should include a tight timeline for delivery of the manual along with a description of which county department is responsible for each phase of development (e.g., a project delivery process).
4. **Develop a fair, just and equitable project prioritization process** – The complete streets law needs to ensure that all neighborhoods benefit from complete streets, including lower-income neighborhoods and communities of color. In addition, many neighborhoods in Howard County, including Guilford, Elkridge and Jessup, have not historically benefited from past investments in walking and biking infrastructure. This is unfair and needs to be corrected.

SUGGESTIONS: The complete streets law should require county staff to develop and make public a quantitative project prioritization system that gives projects points based on health, safety, destination access, demand, multimodal network connectivity, land use, environment, and economic vitality. Where appropriate, qualitative data should also be used to better understand the narrative and historical context behind the numbers. Priority should first be given to transportation projects in communities with documented underinvestment in sidewalks, bike lanes, safe intersections and public transportation service and facilities, as well as to census tracts that have a concentration of both minority and low-income communities and/or a combination of three or more of the following factors: zero- or one- vehicle households; seniors 75 years of age or older, people with disabilities, single parent families, severely rent-burdened households and those with limited English proficiency. This process

should inform future transportation master plans such as Walk Howard and the priority projects listed within.

5. **Evaluate the impact of complete streets** – The complete streets law should require the county to collect performance data at regular intervals beginning with a baseline set to document the county’s progress on achieving complete streets.

SUGGESTIONS: According to experts, performance measures should include, at a minimum, the following metrics and all data collected should be disaggregated by mode, race, gender, and income level to the extent practicable:

- A. **USE/MODE**
 - a. journey to work by mode;
 - b. number of children walking or bicycling to school;
 - c. bikeshare trips; and
 - d. transit ridership.
- B. **SAFETY:**
 - a. number of traffic fatalities and injuries; and
 - b. roadway type and location where traffic fatalities and serious injuries occurred.
- C. **EQUITY**
 - a. percentage of new roadway projects in priority communities;
 - b. a list of connections made that facilitate access for priority communities and connections that are being pursued by projects in planning phases;
 - c. number of community engagement sessions or trainings held in priority communities and number of people engaged or trained from priority communities;
 - d. number of complete streets hearings and number of people participating in these public hearings; and
 - e. number of hearings held in priority communities and number of participants at these hearings.
- D. **ACCESS**
 - a. percentage of the population with direct access to a low-stress bicycle network;
 - b. changes to the bicycle network analysis score;
 - c. changes to the pedestrian experience index; and
 - d. bicycle-, walk-, and age-friendly community rating.
- E. **INFRASTRUCTURE CHANGES**
 - a. percentage of urban/suburban roadway mileage with sidewalks on one and both sides;
 - b. percentage of transit stops served by accessible sidewalks;
 - c. percentage of transit stops with marked crosswalks within 150 feet and number of curb ramps installed or repaired;
 - d. new miles of sidewalk, trail, and bicycle infrastructure; and
 - e. number of new crosswalks, transit stops, and transit services.

F. EXCEPTIONS

- a. number of exceptions granted to the complete streets policy;
 - b. a brief description of each exception;
 - c. any recommendation made by the Howard County Multi-Modal Board regarding each exception; and
 - d. whether or not the exception was made for a transportation project located in a priority community.
- 6. Require transparency** – The complete streets law must guarantee transparency throughout. The quantitative project prioritization system should be described and available on the county website. A list of priority transportation projects should be publicly available on the county website with explanations if progress has not been made on completing them. Any exceptions to building complete streets should be regularly posted on the county website with an explanation as to why the exception was granted. And the performance measures above should be compiled and reported on an annual basis to the County Executive, County Council, county boards, and the public.
- 7. Encourage equitable community engagement** – The complete streets law must guarantee equitable public engagement in order to fully achieve our complete streets vision. The law should include a standard county process for getting public feedback on the quantitative project prioritization system, changes to the Design Manual, and exceptions to complete streets granted. Further, the Design Manual should be reviewed by Howard County’s Multimodal Transportation Board and the public to ensure it fits best practice guidelines every five years after enactment of the law. Additionally, the county should do all it can to overcome barriers to community participation because of race, income, age, disability, English language proficiency and vehicle access of populations affected by a project.
- 8. Include implementation steps and timelines** – The complete streets law should include defined implementation steps and timelines for the first five years after enactment and require the county to report annually on its progress. Implementation steps should also require a meaningful level of training (e.g., 16 hours) for county staff, contractors and boards that deal with transportation projects to ensure that the law is implemented smoothly.
- 9. Ensure all future department regulations, development regulations, and county procedures comply with the complete streets law** – Revisions to the Development Regulations should require that all submissions include an assessment of alternative transportation and that mitigation steps be included if development negatively impacts progress on complete streets.

Again, thank you for the opportunity to comment. The Draft Complete Streets Policy (March 2017) is insufficient as written and will not allow Howard County to achieve its complete streets goals. Please let us know what we can do to help you further refine this draft policy so that it can be drafted into a strong complete streets law.

Sincerely,

Nikki Highsmith Vernick , President & CEO
Horizon Foundation

Jack Guarneri, President
Bike Advocates of Howard County

Jennifer White, Community Advocacy Director
American Heart Association

Hank Greenberg, State Director
AARP MARYLAND

Pastor Larry Walker, President
African American Community Roundtable of
Howard County (AACR)

Joan Driessen, Executive Director
Association of Community Services (ACS)

Wei Guo (Chair of the Board of Directors)
Howard County Chinese School

Hector J. Garcia, Jr., CEO & Executive Director
Foreign-born Information and Referral
Network (FIRN)

Cathy Hammel, President
Gilchrist

Henry Posko, President & CEO
Humanim

Willie Flowers, President
Howard County NAACP

Rev. Paige Getty & Rev. Tyrone Jones, Co-Chairs
People Acting Together in Howard (PATH)

Alex Obriecht, President
Race Pace Bicycles

John K. Hoey, President & CEO
The Y in Central Maryland

cc: Howard County Council
Complete Streets Implementation Team